

Colorado River Basin Regional Water Quality Control Board

RESPONSES TO COMMENTS

Tentative Orders

Waste Discharge Requirements Order R7-2022-0028
and Monitoring and Reporting Program

Scheduled Adoption Date

June 14, 2022

Discharger(s)

Coachillin Energy Company LLC

Agenda Item

9

Facility/Project

Coachillin' Industrial Cultivation &
Ancillary Canna-Business Park—
Wastewater Treatment and Disposal
Facility, Desert Hot Springs

Public Notice

7-22-30

County

Riverside County

Comment Period

May 6 to June 6, 2022

Staff Contact

Scot Stormo, Engineering Geologist
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Table 1. Comments Received.

Commentor, Affiliation	Submittal Date	Notes
Coachillin Energy Company LLC	June 1, 2022	
Mission Springs Water District	June 6, 2022	

COMMENTS FROM COACHILLIN ENERGY COMPANY LLC (CEC)

CEC-1

Finding 13, Location of Onsite Irrigation Well

The Discharger requested that additional detail be included regarding the location of the onsite irrigation well.

Staff Response and Changes

Staff have modified Finding 13 to include the APN number and modified Attachment A, Vicinity Map, to indicate the location of the onsite irrigation well.

CEC-2

Finding 15, Total Dissolved Solids (TDS) Effluent Concentrations

The Discharger indicated that the phrase “TDS of the effluent usually exceeds discharge limits” is misleading because TDS discharge limits were exceeded in only three of the nine sampling events. The Discharger also provided information regarding the low flow rates.

Requested Revisions

The Discharger requested that the word “usually” in Finding 15 be changed to “periodically” to reflect more accurately that effluent TDS concentrations have exceeded effluent limits only three of the nine sampling events.

Comments

Staff concur with changing “usually” to “periodically”. The low flow rates are noted but do not warrant changes to the Order.

Changes

In Finding 15, the word “usually” has been changed to “periodically”.

CEC-3

Finding 19 and Table 3, Background Groundwater Concentrations

The Discharger indicated that the groundwater monitoring data presented in the Order was incomplete and should present the historical range in background concentrations

collected from the 4th quarter of 2019 to the 3rd quarter of 2020 rather than only the first background sample collected.

Requested Revisions

The Discharger requested that Table 3 be expanded to include the range of concentrations detected in the monitoring well during the four quarterly background sampling events rather than just listing the first sampling episode.

Staff Response

Staff agree with the comments.

Changes

Table 3 was changed to present the high and low concentrations detected during the four quarterly background sampling events, and Finding 19 was changed to:

Data collected from the fourth quarter of 2019 to the third quarter of 2020 provides ambient background groundwater conditions.

CEC-4

Special Provision F.2.a, Workplan to Evaluate TDS Impacts

The Discharger requested clarification regarding whether the sampling plan being implemented under the prior Order was sufficient to meet the requirements of Special Provision F.2.a.

Staff Comments

The workplans envisioned by Special Provision F.1 and F.2 were included in the posted draft of the Order to address the exceedances of the discharge limitations for nitrate (F.1) and TDS (F.2). Their comment is now moot because Special Provisions F.1, F.2 and F.3 have been removed from the tentative Order. These issues will be addressed through other means.

Changes

Special Provisions F.1, F.2 and F.3 were deleted.

COMMENTS FROM MISSION SPRINGS WATER DISTRICT (MSWD)

MSWD-1

Connection to the Regional Wastewater Reclamation Facility (RWRF)

MSWD submitted a letter focused mainly on Finding 8, which discusses the construction of the RWRF about half a mile east of the Facility, and whether the Discharger will be connecting to that Facility when it becomes available. Of particular concern was the phrase “The Discharger may connect to MSWD’s WWTP when it becomes available” (emphasis added).

Requested Revisions

MSWD requested that Finding 8 be updated to reflect that the RWRF was under construction and was expected to be ready to receive waste sometime in 2023 rather than in 2025 as stated in the tentative Order.

MSWD also requested the opportunity to discuss the use of the word “may” in Finding 8.

Staff Response and Changes

Based on conversations with MSWD representatives, Finding 8 was changed: (1) to include the updated information on the construction of the RWRF; and, (2) to be consistent with the verbiage used in the prior Order, as follows:

Mission Springs Water District (MSWD) is currently constructing a 1.5-million gpd regional Wastewater Treatment Plant (WWTP) on Little Morongo Road, about a half mile east of the Facility. The WWTP is expected to be ready to receive wastewater sometime in 2023. The Discharger has proposed connecting to MSWD’s WWTP when it becomes available.